

1 Anna Maria Martin (Bar No. 7079)
amartin@mmhllp.com
2 MESERVE MUMPER & HUGHES LLP
316 California Ave. #216
3 Reno, Nevada 89509

4 800 Wilshire Boulevard, Suite 500
Los Angeles, California 90017-2611
5 Telephone: (213) 620-0300
Facsimile: (213) 625-1930
6

7 Attorneys for Defendant
ROCKY MOUNTAIN HOSPITAL AND
8 MEDICAL SERVICE, INC. DBA ANTHEM
BLUE CROSS AND BLUE SHIELD erroneously
9 sued herein as BLUE CROSS OF COLORADO,
a business organization. form unknown

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12
13 LAS VEGAS REGIONAL SURGERY)
CENTER, L.P., A Nevada Limited)
14 Partnership,)

15 Plaintiff,)

16 vs.)

17 BLUE CROSS OF COLORADO, a)
business organization, form unknown, and)
18 DOES 1 - 10,)

19 Defendant.)
20

Case No. 2:18-cv-00093-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
RESPONSE TO PLAINTIFF'S
FIRST AMENDED COMPLAINT
(First Request)**

21 In accordance with L.R. IA 601, the parties stipulate as follows:

22 1. On September 10, 2018, Plaintiff Las Vegas Regional Surgery Center
23 ("Plaintiff" or "LVRSC") filed a First Amended Complaint (Doc. # 29).

24 2. Defendant Rocky Mountain Hospital and Medical Service, Inc. dba
25 Anthem Blue Cross and Blue Shield, erroneously sued herein as Blue Cross of
26 Colorado's ("Defendant" or "Anthem") responsive pleading is currently due on
27 September 24, 2018.
28

1 3. On September 13, 2018, Anna M. Martin, attorney for Anthem learned
2 that her ex-husband had passed away. Ms. Martin has two daughters from the
3 marriage. She is now faced with and responsible for handling all of the funeral
4 arrangements and helping her grieving daughters.

5 4. Counsel for Anthem has sought, and Plaintiff's counsel has agreed to
6 grant Anthem a two week extension of time, until October 9, 2018, to file its
7 response to the First Amended Complaint.

8 5. Accordingly, the parties stipulate that Anthem shall have up to and
9 including October 9, 2018, to file its responsive pleading to the First Amended
10 Complaint.

11 6. This if the first request by Anthem for an extension of time to file a
12 responsive pleading to the First Amended Complaint.

13
14 Dated: September 20, 2018

Anna Maria Martin
MESERVE, MUMPER & HUGHES LLP

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16 By: /s/ Anna Maria Martin
17 Anna Maria Martin
18 Attorneys for Defendant
19 ROCKY MOUNTAIN HOSPITAL
20 AND MEDICAL SERVICE, INC.
21 DBA ANTHEM BLUE CROSS
22 AND BLUE SHIELD

23
24 Dated: September 20, 2018

David J. Merrill
DAVID J. MERRILL, P.C.

25 By: /s/ David J. Merrill
26 David J. Merrill
27 Attorneys for Plaintiff
28 LAS VEGAS REGIONAL SURGERY
CENTER

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ORDER

Good cause appearing therefore, the Parties stipulation is hereby granted. Defendant Rocky Mountain Hospital and Medical Service, Inc. dba Anthem Blue Cross and Blue Shield, erroneously sued herein as Blue Cross of Colorado has a two-week extension on the deadline for filing a responsive pleading to Plaintiff's First Amended Complaint. Defendant's response is now due on or before October 9, 2018.

IT IS SO ORDERED.

DATED: September 23, 2018.



RICHARD F. BOULWARE, II
United States District Court